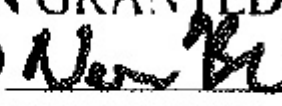




September 6, 2023

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
BroderickNYSDChambers@nysd.uscourts.gov

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 9/7/23

Re: *United States v. Zukeila Plaza*, 1:22-cr-00142-VSB

Dear Judge Broderick:

Ms. Plaza resides in Section 8 housing with one of her two adult sons and is listed as the head of household. *See* Oct. 6, 2022, Letter to the Court. In anticipation of her sentencing, Ms. Plaza seeks to remove her name from the voucher so that her son can continue to live in the apartment. She also anticipates that her other adult son will move into the apartment while she is incarcerated.

On August 25, 2023, Ms. Plaza entered a plea of guilty and the Court reimposed home incarceration. We respectfully ask the Court to modify the conditions of Ms. Plaza's release pending sentencing only to allow her to leave her residence on September 19, 2023, at 7:45 a.m., to attend a 9:00 a.m. appointment with the New York City Housing Authority (NYCHA), located at 478 East Fordham Road in the Bronx. The NYCHA office is approximately one hour away from Ms. Plaza's residence via public transportation. Ms. Plaza called NYCHA to try to resolve this matter without having to leave her residence but was informed that she must attend in person. Please see enclosed images as proof of appointment confirmation from NYCHA.

It is important for Ms. Plaza to meet with NYCHA to secure a home for her family in her absence. Ms. Plaza remains in full compliance with the conditions of her release. Pretrial Services has no objection. The Government objects to this request.

Respectfully submitted,

/s/ Waleska Suero Garcia

John T. Zach
Waleska Suero Garcia

Attorneys for Zukeila Plaza

Copy to:

U.S. Pretrial Officer Francesca Piperato via email



Welcome to NYCHA!

Your appointment

Branch:

Bronx

Service:

1 Eng-RECERT PKG

Date:

09/19/2023

Time:

9:00 am

Your appointment is booked for another day.
Please come back on the date of your
appointment.

Your appointment with NYCHA is confirmed for 09/19/2023 at 09:00 AM at 478 East Fordham Road, Bronx. Mask and current Photo ID are required. Link for appt Check-in <https://qmtc.io/WrapBDnA>

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